

ANDREW O. ISAR

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Via Electronic Mail and Priority Delivery

September 20, 2016

Ms. Sara Clark
Department Secretary
Administrative Unit
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Ste. 820
Boston, MA 02118-6500

RE: FCC Form 481 Data and High-Cost ETC Affidavit

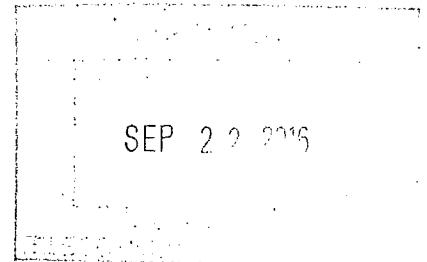
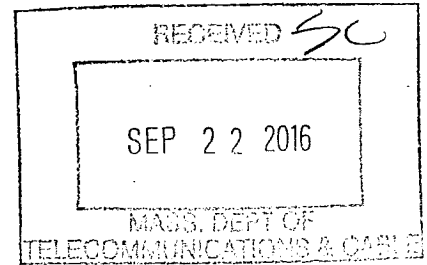
Dear Secretary Clark:

Pursuant to Federal Communications Commission annual reporting requirements for Eligible Telecommunications Carriers ("ETCs"), the Massachusetts Department of Telecommunications and Cable ("Department") May 23, 2016, *Notice* in the above-referenced matter, and the Department's Competition Division September 12, 2016 Email requesting an updated FCC Form 481, X5 RTC LLC dba Richmond Telephone Company ("RTC") submits to the Department its amended FCC Form 481, attached.

This amended FCC Form 481 includes: 1) completed Lines 3009 to 3013; and 2) a revision to the *Five-Year Service Improvement Plan* attachment ("Attachment"). The Attachment has been updated to reflect January-June 2016 data including Universal Service Support information a revision now indicating that the submission is the second progress report, and additional discussion regarding the Richmond Telephone Company's acquisition by RTC, as requested. Audited confidential *Consolidated Financial Statements* for calendar years 2015 and 2014 for Cornerstone Telephone Company, LLC and subsidiaries, including at the time Richmond Telephone Company, are also enclosed with the confidential submission.

RTC requests that the protections requested under the Company's July 14, 2016 *Motion for Confidential Treatment*¹ applicable to its first submission be extended to the amended FCC Form 481 and confidential attachments provided in this submission.

¹ X5 RTC LLC dba Richmond telephone Company Confidential Eligible Telecommunications Carrier Support Documentation Pursuant to 47 C.F.R. §§ 54.313, 54.422, *Motion for Confidential Treatment* (July 14, 2016).



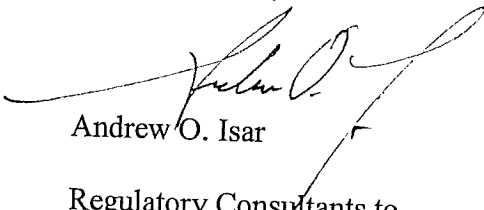
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Per the Department's *Notice*, an original, un-redacted version, two (2) un-redacted copies, and three (3) redacted public copies of the filing are enclosed with the paper version of this submission. Copies of the audited confidential *Consolidated Financial Statements* have been excluded from the redacted public version copies.

Thank you for your attention to this matter. Questions should be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in black ink, appearing to read "Andrew O. Isar", is written over a horizontal line.

Andrew O. Isar

Regulatory Consultants to
X5 OpCo LLC dba Richmond Telephone Company

Enclosures

Cc: Sara Clark (public version via electronic delivery)
Kerri DeYoung Phillips (public version via electronic delivery)

Christopher Bean
Senior Consultant
Regulatory Massachusetts/Rhode Island

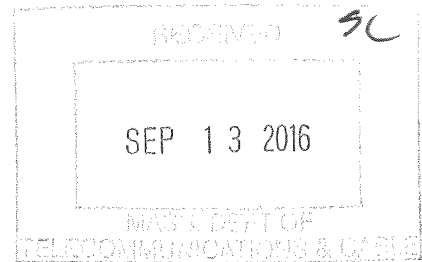


125 High Street, Floor 7
Boston, MA 02110

Phone 617 743-8878

September 12, 2016

Sara Clark, Secretary
Department of Telecommunications and Cable
Commonwealth of Massachusetts
1000 Washington Street, Suite 820
Boston, MA 02118



Re: Form 481 Supplemental filing

Dear Secretary Clark,

At the request of the Department, enclosed for filing is information supplemental to Verizon Massachusetts' FCC Form 481, which was originally filed on July 1, 2016. Included in this filing are the following;

1. Service Quality Standards and Consumer Protection Rules (Section 500);
2. Functionality in Emergency Situations (Section 600); and
3. Lifeline Terms and Conditions (Section 1200).

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "Chris Bean".

Senior Consultant – Regulatory – MA/RI

Enclosures

cc: Kerri DeYoung Phillips, Esq.